

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

COLBY GOROG, JOSHUA FLINT, LOUIS
ROBINSON, and MICHAEL LERRO,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

ELON MUSK and TESLA, INC.,

Defendants.

Civil Action No.: 1:22-cv-05037-AKH

**DECLARATION OF ALEX SPIRO IN SUPPORT OF DEFENDANTS’
OPPOSITION TO PLAINTIFFS’ CROSS-MOTION FOR
LEAVE TO FILE FOURTH AMENDED CLASS ACTION COMPLAINT**

I, Alex Spiro, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a member of the bar of this Court and of the firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Defendants Elon Musk and Tesla, Inc. in the above-captioned action.
2. I respectfully submit this declaration in support of Defendants’ Opposition to Plaintiffs’ Cross-Motion for Leave to File Fourth Amended Class Action Complaint.
3. Annexed hereto as **Exhibit 1** is a true and correct copy of a redline comparing the Third Amended Complaint, Dkt. No. 77, with the proposed Fourth Amended Complaint, Dkt No. 98-1.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 20, 2023 in New York, New York.

/s/ Alex Spiro
Alex Spiro